

**Exhibit A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  JOANN INC., <sup>1</sup>  Post-Effective Date Debtor.	) ) ) ) ) ) )	Chapter 11  Case No. 25-10068 (CTG)  <b>Re: Docket Nos. 1860 and ____</b>
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**CONSENT ORDER APPROVING JOINT STIPULATION  
REGARDING CLAIMS OF B33 SHOPS AT CENTERPOINT III LLC**

Pursuant to and in accordance with the *Joint Stipulation Regarding Claims of B33 Shops at Centerpoint III LLC* (the “Stipulation”)<sup>2</sup> attached hereto as **Exhibit 1**, and the United States District Court for the District of Delaware having jurisdiction over this matter pursuant to 28 U.S.C. § 1334, which was referred to the Court under 28 U.S.C. § 157 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief set forth herein is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and upon all of the proceedings had before this Court; and with the consent of the Parties; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT:**

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<sup>1</sup> The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Stipulation.

1. The Stipulation is hereby approved and the terms of the Stipulation are hereby made effective by this Consent Order.

2. Sufficient notice of this Consent Order has been provided and the requirements of Rule 3007 of the Federal Rules of Bankruptcy Procedure and any applicable local rules of this Court are otherwise satisfied.

3. Notwithstanding any applicable rules to the contrary, this Consent Order shall be immediately binding and enforceable upon its entry.

4. The Debtors and the Plan Administrator are authorized to take all actions necessary to effectuate the relief granted in this Consent Order.

5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Consent Order.

**Exhibit 1**

**Stipulation**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

JOANN INC.,<sup>1</sup>

Post-Effective Date Debtor.

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Chapter 11

Case No. 25-10068 (CTG)

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**JOINT STIPULATION REGARDING  
CLAIMS OF B33 SHOPS AT CENTERPOINT III LLC**

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Ann Aber, the Plan Administrator, for and on behalf of the Debtors (collectively, “Debtors”), and B33 Shops at Centerpoint III LLC (“Landlord” and together with the Debtors, collectively, the “Parties”), by and through their undersigned counsel, hereby enter into this stipulation (this “Stipulation”) as to the following:

1. The Landlord’s lease was rejected effective May 31, 2025.
2. On or about August 6, 2025, Landlord filed a Proof of Claim designated as Claim No. 19765. Claim No. 19765 asserts a claim totaling \$39,269 as an administrative expense claim.
3. Claim No. 19765 has been partially paid, pending receipt of appropriate documentation, which was recently provided to the Plan Administrator following the filing of an objection by the Plan Administrator.
4. Plan Administrator and Landlord hereby agree to resolve the remaining amounts owed in Claim No. 19765 by the allowance and payment of \$8,448.61 as an administrative expense claim, and further agree that upon Landlord’s receipt of such payment, Claim No. 19765 shall be deemed withdrawn with prejudice.

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<sup>1</sup> The Post-Effective Date Debtor in this chapter 11 case, along with the last four digits of its federal tax identification number is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

5. This Stipulation resolves *Plan Administrator's Seventeenth (Substantive) Omnibus Objection to Certain Claims (Unliquidated Claims and Overstated Claims)* [Docket No. 1860] (the "Overstated Objection") solely as to Claim No. 19765. The Parties stipulate and agree that the Plan Administrator may prepare and submit any order in respect of the Overstated Objection that is consistent with this Stipulation.

6. Nothing contained herein constitutes the allowance of any unsecured claim of Landlord. In addition, the Landlord has another claim in this bankruptcy case involving rejection damages. The Stipulation only addresses Claim No. 19765 and does not impact its rejection damage claim.

STIPULATED and AGREED this 9th day of January, 2026:

*[Signature Page Follows]*

Dated: January 9, 2026  
Wilmington, Delaware

/s/ Patrick J. Reilley

**COLE SCHOTZ P.C.**

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- and -

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